

1 **JOSH M. REID**

2 City Attorney

3 Nevada Bar No. 7497

4 **NANCY D. SAVAGE**

5 Assistant City Attorney

6 Nevada Bar No. 392

7 **BRIAN R. REEVE**

8 Assistant City Attorney

9 Nevada Bar No. 10197

10 240 Water Street, MSC 144

11 Henderson, NV 89015

12 (702) 267-1231

13 (702) 267-1201 Facsimile

14 [Nancy.Savage@cityofhenderson.com](mailto:Nancy.Savage@cityofhenderson.com)

15 [Brian.Reeve@cityofhenderson.com](mailto:Brian.Reeve@cityofhenderson.com)

16 Attorneys for Defendants

17 *City of Henderson, Henderson Police Chief Patrick Moers,*

18 *Detective Mark Hosaka and Detective Chad Mitchell*

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 VANESSA KELLEY,

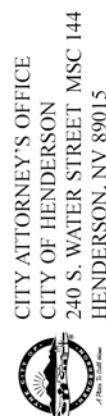
22 Plaintiff,

23 v.

24 CITY OF HENDERSON, a political  
25 subdivision of the State of Nevada and the  
26 County of Clark; LAS VEGAS  
27 METROPOLITAN POLICE DEPARTMENT,  
28 a political subdivision of the State of Nevada  
and the County of Clark d/b/a/ CLARK  
CITY DETENTION CENTER; HENDERSON POLICE CHIEF PATRICK  
MOERS, in his individual capacity; LVMPD SHERIFF DOUGLAS GILLESPIE, in his  
individual capacity; DETECTIVE MARK HOSAKA, in his individual capacity as an  
officer employed by the City of Henderson;  
DETECTIVE CHAD MITCHELL, in his  
individual capacity as an officer employed by  
the City of Henderson; NAPHCARE, medical  
care provider for the Clark County Detention  
Center; CORIZON CORRECTIONAL  
HEALTHCARE, a medical care provider for  
the Henderson Jail; DOE DEFENDANTS I-

29 CASE NO.: 2:15-CV-02204-APG-VCF

30 **STIPULATION AND ORDER TO**  
**EXTEND TIME FOR DEFENDANTS TO**  
**REPLY TO PLAINTIFF'S OPPOSITION**  
**TO THE HENDERSON DEFENDANTS'**  
**MOTION TO DISMISS (Second Request)**



1 X, individually; DOES HENDERSON  
 2 POLICE OFFICERS I-X, individually as  
 3 officers employed by the City of Henderson;  
 4 DOE LVMPD POLICE OFFICERS I-X,  
 5 individually as officers employed by LVMPD;  
 and ROE ENTITIES I-X, inclusive,

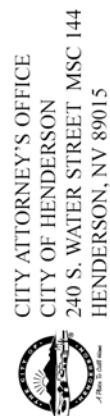
6 Defendants.

7 **STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANTS TO REPLY TO**  
**PLAINTIFF'S OPPOSITION TO THE HENDERSON DEFENDANTS'**  
**MOTION TO DISMISS (Second Request)**

8 COME NOW Plaintiff Vanessa Kelley and Defendants City of Henderson,  
 9 Henderson Police Chief Patrick Moers, Detective Mark Hosaka and Detective Chad  
 10 Mitchell (collectively referred to as "Henderson Defendants"), by and through their  
 11 respective counsel of record, pursuant to LR 6-1, and hereby stipulate, agree and make  
 12 joint application to extend the time for the Henderson Defendants to file their Reply(ies) to  
 13 Plaintiff's Opposition (Doc. 31) to the Henderson Defendants' Motion to Dismiss (Doc. 17).  
 14 The time to file such Reply(ies) to the Plaintiff's Opposition to the Motion to Dismiss (Doc.  
 15 17) are currently due on Thursday, February 11, 2016 pursuant to the Stipulation and  
 16 Order entered on the First Request for Extension. (Doc. 36)

17 The stipulating parties respectfully request a seven (7) day extension up to and  
 18 including Thursday, February 18, 2016, for the Henderson Defendants' above-referenced  
 19 to file their Reply(ies).

20 The stipulating parties submit that good cause exists for this extension. Counsel  
 21 inadvertently included Thursday February 11, as the due date in the First Request, instead  
 22 of Thursday, February 18, 2016 based upon the Henderson Defendants' counsel's  
 23 schedule between the date of filing of the Plaintiff's Opposition to the Motion to Dismiss  
 24 (Doc. 31) and the requested date. As a result an extension up to and including February  
 25 18, 2016 is sought in this request in order to provide for adequate time for counsel to be  
 26 able to reasonably prepare a complete and appropriately supported Reply(ies) on behalf of  
 27 the Henderson Defendants and each of them.



Based upon the foregoing, the parties respectfully request that this Court enter its order extending the time for the Henderson Defendants to file their Reply(ies) to Plaintiff's Opposition to the Henderson Defendants' Motion to Dismiss (Doc. 31), up to and including Thursday, February 18, 2016.

This is the second request for enlargement of time for the Henderson Defendants to file their Reply(ies) to Plaintiff's Opposition to the Motion to Dismiss and it is made in good faith and not for the purposes of delay.

## POTTER LAW OFFICES

CITY OF HENDERSON  
JOSH M. REID, City Attorney

/s/ Cal J. Potter

CAL J. POTTER, III, ESQ.  
Nevada Bar No. 1988  
CAL J. POTTER, IV, ESQ.  
Nevada Bar No. 13225  
1125 Shadow Lane  
Las Vegas, Nevada 89102  
Attorneys for Plaintiff

/s/ Nancy D. Savage

JOSH M. REID, ESQ.  
City Attorney  
Nevada Bar No. 7497  
NANCY D. SAVAGE, ESQ.  
Assistant City Attorney  
Nevada Bar No. 392  
240 Water Street, MSC 144  
Henderson, Nevada 89009  
Attorney for Henderson Defendants

DATED: February 8, 2016

DATED: February 8, 2016

## ORDER

IT IS SO ORDERED this 9th day of February, 2016.



## UNITED STATES DISTRICT JUDGE